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PLEASE REPLY TO  
NEW JERSEY OFFICE

October 20, 2010

### VIA ECF

Hon. Michael A. Shipp, U.S.M.J.  
District of New Jersey  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

RE: Renaissance Carpet and Tapestries, Inc. v. S&H Rugs, Inc. et al.  
Civil Action No. 09-CV-00632 (SRC-MAS)

Dear Judge Shipp:

We represent Defendants S&H Rugs, Inc. and Ori Wilbush in the above-referenced matter. We write to provide you with a status update on our progress regarding discovery and document production.

In reference to the discovery conference held before you on October 14, 2010, and the various issues discussed, we have worked diligently this past week. We have completed a supplemental document production of communications between our office and our expert, David Castriota. Additionally, we have recently obtained a large number of images of carpets from our client's inventory. We are ready to produce the majority of the discussed items to Plaintiff's counsel tomorrow and Friday of this week.

We have also recently obtained the email correspondence from our clients. Unfortunately, we are currently experiencing technical difficulties in downloading the full text of these emails. We are working with technicians and doing everything we can to resolve this technical issue. We will provide Plaintiff's counsel with a complete production set of these documents as soon as possible.

Hon. Michael A. Shipp, U.S.M.J.

October 20, 2010

Page 2

As we complete this process, we will provide a certification that all documents in our clients' possession have been produced. Thank you for your attention to this matter.

Very truly yours,



Jay R. McDaniel

CC: Ronald Meister, Esq. (*via ECF and Facsimile*)

Ori Wilbush (*via email*)